

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
JEDINA BARNAMAN,

Plaintiff(s),

-against-

ARMELLINI EXPRESS LINES, INC, DAVID BROWN
AND TAMUR RASUL,

Defendant(s).
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Index No.:

Date Purchased:

SUMMONS

Plaintiff designates Kings
County as the place of trial.

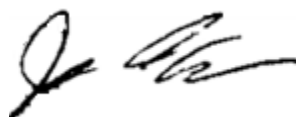
The basis of venue is:
Plaintiff's residence

Plaintiff resides at:
131 East 21 Street,
Brooklyn, NY 11226

To the above-named Defendants:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty (20) days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within thirty (30) days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: NEW YORK, NEW YORK
December 1, 2021



James Hodnett, Esq.
ADAM D. POLO, ESQ., P.C.
Attorneys for Plaintiff
8 W 38th Street, Suite 803
New York, New York 10018
(212) 221-6221
File No. 2100172

To: Armellini Express Lines, Inc
Via BCL 307
3446 SW Armellini Avenue
Palm City, FL 34990

David Brown
Via VTL 253

188-98 Still Lake Dr
Jupiter, FL 33458

Tamur Rasul
Via VTL 253
124 Harrison Avenue
Jersey City, NJ 07304

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
JEDINA BARNAMAN,

VERIFIED COMPLAINT

Plaintiff(s),

Index No.:

Date Purchased:

-against-

ARMELLINI EXPRESS LINES, INC, DAVID BROWN
AND TAMUR RASUL,

Defendant(s).

-----X

Plaintiff, **JEDINA BARNAMAN**, by her attorneys, **ADAM D. POLO, ESQ., P.C.**,
complaining of the Defendants, **ARMELLINI EXPRESS LINES, INC, DAVID BROWN and
TAMUR RASUL**, respectfully alleges, upon information and belief:

1. At commencement of this action, Plaintiff, **JEDINA BARNAMAN**, resided in the
County of Kings, City and State of New York.

2. That at all times herein mentioned, the Defendant, **ARMELLINI EXPRESS
LINES, INC**, was and still is a foreign corporation, duly organized and existing under and by
virtue of the laws of the State of Florida.

3. That at all times herein mentioned, the Defendant, **ARMELLINI EXPRESS
LINES, INC**, was and still is a foreign corporation not authorized to do business in the State of
New York.

4. That at the time of the commencement of this action, Defendant, **ARMELLINI
EXPRESS LINES, INC**, was operating a business in the County of Martin and State of Florida.

5. That at the time of the commencement of this action, Defendant, **ARMELLINI
EXPRESS LINES, INC**, maintained a principal place of business at 3446 SW Armellini Avenue,

Palm City, Florida 34990, in the County of Martin, State of Florida.

6. At commencement of this action, Defendant, **DAVID BROWN**, resided in the County of Palm Beach, State of Florida.

7. At commencement of this action, Defendant, **TAMUR RASUL**, resided in the County of Hudson, State of New Jersey.

8. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **ARMELLINI EXPRESS LINES, INC**, was the owner of a 2020 International motor vehicle bearing Florida license plate number JB07IS.

9. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **ARMELLINI EXPRESS LINES, INC**, managed the aforementioned 2020 International motor vehicle.

10. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **ARMELLINI EXPRESS LINES, INC**, maintained the aforementioned 2020 International motor vehicle.

11. That on and/or before November 10, 2020, Defendant, **ARMELLINI EXPRESS LINES, INC**, inspected the aforementioned 2020 International motor vehicle

12. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **ARMELLINI EXPRESS LINES, INC**, controlled the aforementioned 2020 International motor vehicle.

13. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **DAVID BROWN**, was the owner of a 2020 International motor vehicle bearing Florida license plate number JB07IS.

14. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **DAVID BROWN**, managed the aforementioned 2020 International motor vehicle.

15. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **DAVID BROWN**, maintained the aforementioned 2020 International motor vehicle.

16. That on and/or before November 10, 2020, Defendant, **DAVID BROWN**, inspected the aforementioned 2020 International motor vehicle

17. That on November 10, 2020, and at all times herein mentioned, Defendant, **DAVID BROWN**, controlled the aforementioned 2020 International motor vehicle.

18. That on November 10, 2020, and at all times herein mentioned, Defendant, **DAVID BROWN**, operated the aforementioned 2020 International motor vehicle with the knowledge of its owner, Defendant, **ARMELLINI EXPRESS LINES, INC.**

19. That on November 10, 2020, and at all times herein mentioned, Defendant, **DAVID BROWN**, operated the aforementioned 2020 International motor vehicle with the consent of its owner, Defendant, **ARMELLINI EXPRESS LINES, INC.**

20. That on November 10, 2020, and at all times herein mentioned, Defendant, **DAVID BROWN**, operated the aforementioned 2020 International motor vehicle with on the business of its owner, Defendant, **ARMELLINI EXPRESS LINES, INC.**

21. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **TAMUR RASUL**, was the owner of a 2013 Lexus motor vehicle bearing New Jersey license plate number F25LGH.

22. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **TAMUR RASUL**, managed the aforementioned 2013 Lexus motor vehicle.

23. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **TAMUR RASUL**, maintained the aforementioned 2013 Lexus motor vehicle.

24. That on and/or before November 10, 2020, Defendant, **TAMUR RASUL**, inspected the aforementioned 2013 Lexus motor vehicle

25. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **TAMUR RASUL**, controlled the aforementioned 2013 Lexus motor vehicle.

26. That on and/or before November 10, 2020, and at all times herein mentioned, Defendant, **TAMUR RASUL**, operated the aforementioned 2013 Lexus motor vehicle.

27. That on November 10, 2020, Linden Blvd and Bedford Avenue, Brooklyn, NY was a roadway and/or highway in the county of Kings, City and State of New York. (hereinafter referred to as the “Location”)

28. That on November 10, 2020, and at the time of the commencement of this action, Linden Blvd and Bedford Avenue, Brooklyn, NY was a public highway, roadway, street and/or thoroughfare.

29. That on November 10, 2020, Plaintiff, **JEDINA BARNAMAN**, was a passenger in the aforementioned 2013 Lexus motor vehicle with New Jersey license plate number F25LGH.

30. That on November 10, 2020, Defendant, **DAVID BROWN**, was operating the 2020 International motor vehicle at or near Linden Blvd and Bedford Avenue, Brooklyn, NY.

31. That on November 10, 2020, Defendant, **TAMUR RASUL**, was the operator of the aforementioned 2013 Lexus motor vehicle at or near Linden Blvd and Bedford Avenue, Brooklyn, NY.

32. That on November 10, 2020, Plaintiff, **JEDINA BARNAMAN**, was a passenger in the aforementioned 2013 Lexus motor vehicle.

33. That on November 10, 2020, at or near the aforesaid intersection, the 2020 International motor vehicle, owned by Defendant, **ARMELLINI EXPRESS LINES, INC**, and operated by **DAVID BROWN**, came into contact with the 2013 Lexus motor vehicle owned and operated by Defendant, **TAMUR RASUL**, in which Plaintiff, **JEDINA BARNAMAN**, was a passenger thereof.

34. That as a result of the aforesaid contact, Plaintiff, **JEDINA BARNAMAN**, was seriously injured.

35. That the aforesaid occurrence was caused wholly and solely by reason of the joint and/or several negligence of the Defendants, **ARMELLINI EXPRESS LINES, INC, DAVID BROWN and TAMUR RASUL**, without any fault or negligence on the part of the Plaintiff, **JEDINA BARNAMAN**, contributing thereto.

36. That by the reason of the foregoing, Plaintiff, **JEDINA BARNAMAN**, sustained serious, severe and permanent personal injuries; and Plaintiff, **JEDINA BARNAMAN**, was otherwise damaged.

37. That Plaintiff, **JEDINA BARNAMAN**, sustained serious injuries as defined by §5102(d) of the Insurance Law of the State of New York.

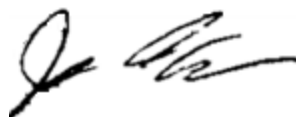
38. That Plaintiff, **JEDINA BARNAMAN**, sustained serious injuries and economic loss greater than basic economic loss as defined by §5104 of the Insurance Law of the State of New York.

39. That this action falls within one or more of the exemptions set forth in CPLR §1602.

40. That Plaintiff, **JEDINA BARNAMAN**, has been damaged in a sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff, **JEDINA BARNAMAN**, demands judgment jointly and/or severally against the Defendants herein, **ARMELLINI EXPRESS LINES, INC, DAVID BROWN and TAMUR RASUL**, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action, and any other relief this honorable Court may deem just and proper.

Dated: NEW YORK, NEW YORK
December 1, 2021



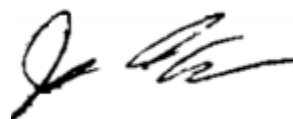
James Hodnett, Esq.
ADAM D. POLO, ESQ., P.C.
Attorneys for Plaintiff
Jedina Barnaman
8 W 38th Street, Suite 803
New York, New York 10018
(212) 221-6221

Attorney's Verification

James Hodnett, an attorney duly admitted to practice law in the State of New York and associated with Adam D. Polo, Esq., P.C., attorneys for Plaintiff herein, and that I have read the foregoing Summons and Verified Complaint and that the contents thereof; is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters, deponent believes them to be true.

The source of deponent's knowledge is based upon a review of the litigation file maintained in the office. This verification is made by deponent rather than by the plaintiff in that the plaintiff is not now within New York County, in which county deponent regularly maintains an office.

Dated: New York, New York
December 1, 2021



James Hodnett, Esq.

Adam D. Polo, Esq., P.C.

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Defendant(s).

SUMMONS AND COMPLAINT

Adam D. Polo, Esq., P.C.
Attorneys for Plaintiff
8 W 38th Street, Suite 803
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TO: ALL PARTIES